

OUTTEN & GOLDEN LLP

Adam T. Klein*
Ossai Miazad*
Lewis M. Steel*
Christopher M. McNerney*
685 Third Avenue, 25th Floor
New York, NY 10017
(212) 245-1000

**LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW**

Jon Greenbaum*
1401 New York Ave., NW
Washington, DC 20005
(202) 662-8600

** Pro hac vice motions granted*

PUBLIC INTEREST LAW CENTER

Benjamin D. Geffen
Pennsylvania Bar. No. 310134
Claudia De Palma
Pennsylvania Bar No. 320136
1500 JFK Blvd., Suite 802
Philadelphia, PA 19102
(267) 546-1308

WILLIG, WILLIAMS & DAVIDSON

Ryan Allen Hancock
Pennsylvania Bar No. 92590
Jessica Brown
Pennsylvania Bar No. 87322
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(215) 656-3679

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRANK LONG, JOSEPH SHIPLEY,
MICHAEL WHITE, and RAMEE
GARNETT, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

SOUTHERN PENNSYLVANIA
TRANSPORTATION AUTHORITY,

Defendant.

Case No.: 2:16-cv-1991-PBT

**PLAINTIFFS' NOTICE OF MOTION FOR
APPROVAL OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, and in the Declaration of Ossai Miazad in Support of Plaintiffs' Motions for Final Approval of Class Action Settlement and Final Certification of Settlement Classes, Approval of Service Awards, and Approval of Attorneys' Fees and Reimbursement of Expenses ("Miazad Decl."), and the supporting exhibits thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) awarding Plaintiffs attorneys' fees in the amount of \$1,200,000.00, which is one-third of the settlement fund; and
- (2) reimbursing \$70,052.16 in out-of-pocket expenses that Class Counsel incurred in this action.

* * *

Plaintiffs submit a Proposed Order, attached to the Miazad Decl. as **Exhibit B**, for the Court's convenience.

Dated: New York, NY
September 22, 2021

Respectfully submitted,

/s/ Ossai Miazad
Ossai Miazad
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, NY 11211
Telephone: (212) 245-1000

Attorney for Plaintiffs and proposed Class Members

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Motion for Approval of Attorneys' Fees and Reimbursement of Expenses was served on this 22nd day of September, 2021, upon all counsel of record via the Court's ECF filing system.

/s/ Ossai Miazad
Ossai Miazad